

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

IN RE:

REYNOLDS, DANIEL JON

REYNOLDS, AMANDA JO

Debtors.

)  
)  
)  
)  
)

CASE NO. 09-00793-BHL-7A

**MOTION TO SELL**

Comes now Thomas A. Krudy, the Chapter 7 trustee herein, by counsel, Paul D. Gresk, and in support of this motion makes the following showing:

- 1) That the debtors filed for relief from their debts pursuant to Chapter 7 of the U.S. Bankruptcy Code on January 28, 2009.
- 2) That Thomas A. Krudy is the duly appointed Chapter 7 trustee of this bankruptcy proceeding.
- 3) That on the date of this bankruptcy filing the debtors had nonexempt business assets, i.e. various tools, equipment, trailers, etc., that were considered property of the estate pursuant to 11 U.S.C. 541 and therefore, subject to turn over.
- 4) That this Court has issued an order authorizing the employment of Earl's Auction Company and Liquidators to conduct a public auction of the business assets that are the subject to this motion.
- 5) That the Chapter 7 trustee seeks authority to have a public auction of the business assets conducted and authority to execute any document that is necessary to convey title to the purchaser of each item.

WHEREFORE, Thomas A. Krudy, the Chapter 7 trustee of this bankruptcy proceeding, seeks authority from this Court that will authorize him to sell, at public auction the debtors business assets that have been turned over to him and for authority to execute any document that is necessary to convey title to the purchaser of any item sold.

Respectfully submitted,

/S/ Paul D. Gresk

Paul D. Gresk, Counsel for the  
Chapter 7 trustee  
GRESK & SINGLETON, LLP  
150 East 10<sup>th</sup> Street  
Indianapolis, Indiana 46204  
Phone: (317)237-2913  
Fax: (317)237-7912  
Email: bankruptcy@gsllawindy.com

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this pleading has been served upon the below named parties by either U.S. mail, postage prepaid and/or electronic mail on the date upon filing with the United States Bankruptcy Court.

John T. McManus  
jtmlaw@hotmail.com

/s/ Paul D. Gresk

Paul D. Gresk